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November 4, 2022

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Public Service Commission of South Carolina - Administrative and Procedural Matters
Docket No. 2005-83-A

Procedural Schedule for the Integrated Resource Plans (IRP's) Filed with the Public Service Commission
Docket No. 2022-162-E

Dear Ms. Boyd:

Please allow this letter to serve as confirmation that the South Carolina Office of Regulatory Staff ("ORS") intends to participate in the forum regarding the procedural schedules for dockets involving Integrated Resource Plans ("IRPs") scheduled for November 15, 2022 ("the Forum"). ORS also takes this opportunity to offer its written comments on the development of IRP procedural schedules in advance of the Forum.

On October 28, 2022, Staff for the Public Service Commission of South Carolina ("Commission Staff") filed in the above-referenced dockets Draft IRP Procedural Schedules ("Commission Staff's Draft Schedules") for Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively, "Duke Energy"), Dominion Energy South Carolina, Inc. ("DESC"), and Santee Cooper (collectively, "Companies" and individually, "Company"). ORS respectfully offers certain revisions to the Commission Staff's Draft Schedules designed to (1) provide equivalent amounts of time between each phase of the Companies' IRP proceedings, (2) provide flexibility in IRP Update filing deadlines so as to avoid to the greatest extent possible a Company having concurrent or close-in-time comprehensive IRP and annual IRP Update proceedings, and (3) suggest that adoption of a triennial comprehensive IRP review schedule most closely aligns with robust planning efforts by the Companies.

1. Suggested Modifications to 2023-2024 IRP Procedural Schedules

ORS made minor modifications to Commission Staff’s Draft Schedules for the purpose of establishing, to the greatest extent possible, an equal number of working days between each phase of a Company’s comprehensive IRP proceeding. ORS believes that establishing schedules for the Companies’ comprehensive IRP proceedings that mirror each other in time between phases is fair to the Companies and equitably allocates ORS’s time and resources in review of each Company’s IRP.

In ORS’s proposal, the dates for the Companies’ IRP Filings and the Commission Hearings remain unchanged from the Commission Staff’s Draft Schedules. ORS proposes minor changes to due dates of certain Company Direct, All Other Party (“AOP”) Direct, Rebuttal, and Surrebuttal testimonies. ORS’s proposed 2023-2024 IRP Procedural Schedule for the Companies is as follows:

Company	IRP Filed	Company Testimony	Other Parties Testimony	Rebuttal Testimony	Surrebuttal Testimony	Hearing	300 Days From IRP Filing Date ¹
DESC	Jan. 30, 2023	Apr. 4, 2023	June 27, 2023	July 25, 2023	Aug. 15, 2023	Aug. 28, 2023	Nov. 26, 2023
Santee Cooper	May 15, 2023	July 14, 2023	Sept. 22, 2023	Oct. 27, 2023	Nov. 17, 2023	Dec. 4, 2023	Mar. 10, 2024
Duke	Aug. 15, 2023	Oct. 24, 2023	Jan. 16, 2024	Feb. 13, 2024	Mar. 5, 2024	Mar. 18, 2024	June 10, 2024

The dates proposed for Santee Cooper are the same as those proposed by Santee Cooper in its letter filed with the Commission on November 1, 2022. Also, ORS understands that DESC does not object to the above proposed dates.

2. Filing Dates for IRP Updates Should Remain Flexible

ORS does not recommend establishing dates certain by which the Companies must file IRP Updates. Under Act 62, the Commission, no later than 300 days after the Company files its comprehensive IRP, shall issue a final order approving, modifying, or denying the plan. S.C. Code Ann. § 58-37-40(C)(1). If the Commission modifies or rejects the plan, the Company shall submit a revised plan within sixty days of the final order. S.C. Code Ann. § 58-37-40(C)(3). The ORS then has sixty days in which to review the revised plan and submit a report thereon to the Commission. *Id.* The Commission must then take final action on the plan within sixty days after receipt of the report from ORS. *Id.*

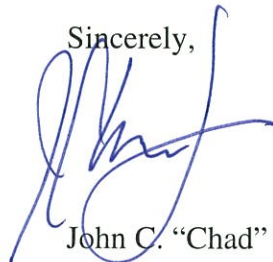
¹ Under S.C. Code Ann. § 58-37-40(C)(1), the Commission, no later than 300 days after the Company files its comprehensive IRP, shall issue a final order approving, modifying, or denying the plan.

In instances where the Commission modifies or denies a Company's plan, the time period for modifying and resubmitting the plan to the Commission can extend up to and even beyond the filing deadline for the Company's IRP Update. As such, ORS recommends that rather than setting dates certain by which IRP Updates must be filed, that the Commission establish a procedure that links the IRP Update due date to Commission approval of the preceding comprehensive IRP. For example, in its Order approving a Company's comprehensive IRP, the Commission could establish the filing deadline for the next IRP Update based upon factors such as the amount of intervening time between the Commission's Order and the filing deadline for the Company's next comprehensive IRP.

3. A Triennial Comprehensive IRP Review is Most Appropriate

ORS believes that adoption of a triennial comprehensive IRP review schedule is most likely to encourage robust planning efforts by the Companies and avoid expenditure of unnecessary resources. Though changes in commodity prices, environmental regulations, and geopolitical concerns can impact resource planning in relatively short measure, as a general rule, planning an optimized generation resource portfolio is a long-range endeavor. Act 62 requires that the Companies prepare and submit to the Commission an IRP "at least every three years." S.C. Code Ann. § 58-37-40(A). ORS believes that a triennial comprehensive IRP review of the Companies' resource portfolios offers the Commission and the Companies' ratepayers the confidence that a given plan is optimized based on then-current conditions.

Thank you for the opportunity to provide these comments and for the Commission Staff's ongoing efforts to develop and establish effective procedural schedules.

Sincerely,

John C. "Chad" Torri

cc: All Parties of Record (via electronic mail)
C. Jo Anne Wessinger Hill, Esquire (via electronic mail)